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November 7, 2023

VIA ECF

Honorable Jennifer L. Rochon
United States District Judge
500 Pearl Street
New York, New York 10007

Re: Grytsyk v. Morales, et al.
19 CV 3470 (JLR)

Dear Judge Rochon:

I am the attorney for the plaintiff in the above-referenced action. I write, on behalf of all parties, to jointly request that Your Honor extend the deadline for the parties to submit their pre-trial documents and motion from December 1, 2023, with opposition due December 7, 2023, until February 27, 2024, with opposition due March 5, 2023.

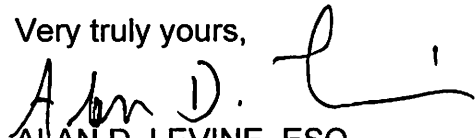
By way of brief procedural background, on September 19, 2023, the Court rendered its decision on defendants' motion for summary judgment and set a schedule for the parties to file their pretrial materials, as specified in Your Honor's Individual Rules and Practices, within forty-five days of the court's decision. See Civil Docket Entry No. 174. On October 2, 2023, the parties submitted a joint request that a settlement conference be scheduled and that Your Honor stay the deadline for pretrial filings until after the conference could take place. See Civil Docket Entry No. 177. Your Honor extended the deadline to file pretrial materials until December 1, 2023, and referred the matter for a settlement conference to Magistrate Judge Katharine H. Parker. See Civil Docket Entry No. 177. In the same order, Your Honor scheduled a final pretrial conference for April 9, 2024. *Id.* On October 3, 2023, Judge Parker scheduled a pre-settlement conference for November 1, 2023. See Civil Docket Entry No. 176. At the conference, Judge Parker scheduled an in-person settlement conference for the first date available to the Court, January 23, 2024. See Civil Docket Entry No. 178.

This requested extension is now necessary to allow the parties to fully engage in settlement discussions and to ensure that attorneys' fees do not become an impediment to resolution. Because Your Honor's decision on the motion for summary judgment has

settled the issue of what claims remain for trial, the parties have been able to have productive conversations regarding possible settlement. Further, given that the final pretrial conference is currently scheduled for April 9, 2024, this request causes no further delay in the resolution of this matter. The parties are hopeful that this matter can be resolved before trial.

As such, the parties jointly and respectfully request that Your Honor extend the deadline for the parties to submit their pre-trial materials from December 1, 2023, with opposition due December 7, 2023, until February 27, 2024, with opposition due March 5, 2023.

The parties thank the Court for its consideration.

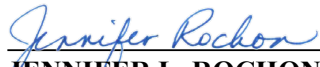
Very truly yours,

ALAN D. LEVINE, ESQ.

ADL/sr
cc: KellyAnne Holohan, Esq.

The request is GRANTED. The deadline for the parties to submit their pre-trial materials is February 27, 2024, with opposition due March 5, 2023.

Dated: November 8, 2023
New York, NY

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge